

DECLARATION OF GARY M. BRIGHT

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I, GARY M. BRIGHT, hereby declare under penalty of perjury the following is true and correct to the best of my information and belief.

1. I am a partner in the law firm of Bright & Powell and am duly authorized to practice law in all courts of the State of California.

2. The law firm of Bright & Powell began as a sole proprietorship by the undersigned in 1976 and presently consists of four attorneys. Throughout its existence and continuing through the present, the firm has represented a great number of local harbor businesses, commercial fishermen and individuals having business and/or leisure interest in the Santa Barbara harbor area.

3. On or about June 25, 1984 I was informed by Mr. Joe Novara of the remarks made by Mr. Al Bei to at least two of my existing clients (Alley Galley Sandwich Shop and Argonaut Yacht Sales, and possibly others). (See Declaration of Joe Novara attached hereto.) At that time I certainly felt "emotional distress" within the meaning of Code of Civil Procedure Section 527.6 but what more accurately be described as anger. Mr. Bei and the so-called "Task Force" and those that hire those individuals or organizations are in my opinion attempting by falsehood and innuendo to annoy, harass, and damage my law firm's professional reputation with its existing clientele in the false hope that I will withdraw my firm's services as concerns the Advanced Ability Center.

4. On or about June 26, 1984 I telephoned the phone number left by Mr. Bei with Mr. Novara, being (213)-484-6746, in an attempt to ascertain who was responsible for that group. An individual

205
- 250 -

1 answered that phone number as "Task Force" I requested to talk to
2 Mr. Bei or Mr. Stan Lewis and was told after leaving my name, both
3 of these individuals were currently in the "field" on assignment and
4 would return my call promptly. To date I have received no return
5 phone call from either of those individuals or anyone else
6 representing the "Task Force."

7 5. I am informed and believe and thereon state that Mr. Al Bei
8 is in fact a private investigator working for Ingram Investigations,
9 (See Exhibit "J") which organization is in turn hired by the
10 Church of Scientology International and its satellite organizations
11 to annoy, harass and intimidate individuals and groups perceived as
12 "enemies" of the Church of Scientology. My individual name as well
13 as the firm's name of Bright & Powell has been publicly associated
14 with the representation of the Advanced Ability Center and
15 individuals associated with the Center. (See Exhibit "C" hereto).

16 6. On or about June 25, 1984 I received a telephone call from
17 Mr. John Peterson who I know from past matters is an attorney
18 practicing law in the Los Angeles area and is a legal spokesman for
19 the Church of Scientology International. (See Exhibit "A" hereto).
20 Mr. Peterson indicated while his office did not represent Mr. Al
21 Bei, Ingram Investigations, or the "Task Force On White Collar Crime
22 and Drugs," he would contact his clients (referring to the Church of
23 Scientology International) to determine if these matters could be
24 corrected.

25 7. Subsequent to my phone conversation with Mr. Peterson, I am
26 informed that the private investigators from Ingram Investigators,
27 the so-called "Task Force," as well as Church of Scientology
28 personnel which had leased the offices immediately above those of

206
- 251 -

1 the Advanced Ability Center had left the Santa Barbara area and no
2 new acts of harassment have occurred to my knowledge as concerns
3 either my law firm or the Advanced Ability Center or its personnel
4 or family members thereof.

5 8. While I attribute this immediate cessation of activity to
6 Mr. Peterson's efforts, and am grateful therefor, as Mr. Peterson
7 does not represent those individuals and groups primarily involved
8 in the acts of harassment herein described, I feel a court
9 injunction preventing the resurgence of such conduct in the future
10 is both necessary and appropriate.

11 9. If called as a witness I would competently testify as to
12 the above matters.

13 Executed at Santa Barbara, California on June 29, 1984.

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GARY M. BRIGHT